

**THE UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

George Perrot,)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:18-CV-10147
)	
Thomas Kelly, et al)	
Defendants)	
)	

MOTION FOR CHANGE OF VENUE

Now come the City of Springfield, Cheryl Clapprood, Charles Arpin, Ronald St. Germain, Marianne Popko (n/k/a Moriarty), Paul Glantz, Thomas Kennedy, Richard Kane, Andrew Canevari and Thomas Jarvis, and move pursuant to 28 U.S.C. §1404(a) for transfer of this matter to the Springfield Division of the Massachusetts Federal District Court for purposes of trial and all pre-trial matters, including the conduct of discovery.

A memorandum in support of this motion is filed herewith.

CERTIFICATE OF CONSULTATION

I, Lisa C. deSousa, hereby certify that the foregoing Motion for Change of Venue was discussed with Plaintiff's counsel telephonically on September 17, 2018 and the parties were unable to narrow the issues.

/s/ Lisa C. deSousa
Lisa C. deSousa, Esq.

Respectfully submitted,
The Defendants
City of Springfield,
Cheryl Clapprood, Thomas Kennedy,
Marianne Popko (n/k/a Moriarty),
By their attorneys

/s/ Lisa C. deSousa
/s/ Kathleen E. Sheehan
/s/ Edward M. Pikula
/s/ Jeremy Saint Laurent
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Dated: October 4, 2018

Respectfully submitted,
The Defendant,
Richard Kane,
By his attorney

/s/ Carole Sakowski Lynch
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Dated: October 4, 2018

Respectfully submitted,
the Defendant,
Charles Arpin,
by his attorney,

/s/ Austin M. Joyce
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Dated: October 4, 2018

Respectfully submitted,
The Defendants,
Andrew Canevari, Paul Glantz,
Thomas Jarvis and Ronald St. Germain
By their attorney

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Dated: October 4, 2018

CERTIFICATE OF SERVICE

I, the undersigned do hereby certify a true copy of the within Motion for Change of Venue was this day served upon all parties of record via the Federal Court's ECF Notice and Delivery System. I am not aware of any party who is a non-registered participant, and therefore electronic filing is the sole means of service of this document.

Signed under the pains and penalties of perjury this 4th day of October 2018.

/s/ Lisa C. deSousa
Lisa C. deSousa, Esq.